

United States v. Ci'Preaunni Ja'Von Stewart, et al.

institutions, by means of false and fraudulent pretenses, representations, and promises.

Purpose of the Scheme and Artifice

2. The purpose of the scheme and artifice was to obtain money from financial institutions by false and fraudulent means.

Scheme and Artifice

3. The defendants attempted to, and fraudulently obtained moneys, funds, and credits from financial institutions by: (1) negotiating counterfeit personal checks drawn on accounts maintained by financial institutions that had been closed or contained insufficient funds; (2) negotiating the checks at the point of sale in several retail stores; (3) falsely claiming that the negotiated personal checks were traveler's checks to the retail store cashiers, causing the counterfeit nature of the checks to go undetected; and (4) using the false checks to obtain gift cards and merchandise in order to enrich the defendants.

Execution of the Scheme and Artifice

4. On or about the dates set forth below, within the State and District of Minnesota, the defendants,

CI'PREAUNNI JA'VON STEWART,
a/k/a Cipre Stewart,
a/k/a Cipreaunni Javon Stewart,
a/k/a Cipre Aunni Stewart, and
RYAN LAMARR CHAMBERS,
a/k/a Ryan L. Chambers,
a/k/a Ryan Lamon Chambers,
a/k/a Ryan Epps,

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aiding and abetting and being aided and abetted by each other and others, did knowingly and intentionally execute, and attempt to execute, a scheme and artifice to defraud USAA Federal Savings Bank and Winona National Bank, financial institutions whose deposits were at all times relevant to the charges insured by the Federal Deposit Insurance Corporation, and to obtain, by means of false and fraudulent pretenses and representations, moneys, funds, and credits owned by and under the custody and control of such financial institutions, by engaging in the following fraudulent transactions set forth in each count below:

| Count | Date (on or about) | Description |
|-------|--------------------|--|
| 1 | 7/30/2011 | Used, at a retail store in Buffalo, Minnesota, check no. 246 in the amount of \$376.19, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 2 | 7/30/2011 | Used, at a retail store in Buffalo, Minnesota, check no. 247 in the amount of \$400.00, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 3 | 7/30/2011 | Used, at a retail store in Buffalo, Minnesota, check no. 1166 in the amount of \$335.01, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 4 | 7/30/2011 | Used, at a retail store in Medina, Minnesota, check no. 248 in the amount of \$363.73, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |

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| Count | Date (on or about) | Description |
|-------|--------------------|--|
| 5 | 8/28/2011 | Used, at a retail store in Oakdale, Minnesota, check no. 256 in the amount of \$367.45, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 6 | 8/28/2011 | Used, at a retail store in Oakdale, Minnesota, check no. 257 in the amount of \$343.15, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 7 | 8/28/2011 | Used, at a retail store in Oakdale, Minnesota, check no. 1172 in the amount of \$289.78, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 8 | 8/28/2011 | Used, at a retail store in Woodbury, Minnesota, check no. 258 in the amount of \$336.33, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 9 | 8/28/2011 | Used, at a retail store in Woodbury, Minnesota, check no. 1173 in the amount of \$400.00, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 10 | 8/28/2011 | Used, at a retail store in Woodbury, Minnesota, check no. 1174 in the amount of \$369.83, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 11 | 8/28/2011 | Used, at a retail store in Vadnais Heights, Minnesota, check no. 260 in the amount of \$375.13, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |

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| Count | Date (on or about) | Description |
|-------|--------------------|---|
| 12 | 8/28/2011 | Used, at a retail store in Vadnais Heights, Minnesota, check no. 1175 in the amount of \$358.69, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 13 | 10/2/2011 | Used, at a retail store in St. Louis Park, Minnesota, check no. 393 in the amount of \$400.00, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 14 | 10/2/2011 | Used, at a retail store in St. Louis Park, Minnesota, check no. 394 in the amount of \$400.00, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 15 | 10/2/2011 | Used, at a retail store in St. Louis Park, Minnesota, check no. 1183 in the amount of \$352.32, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 16 | 10/2/2011 | Used, at a retail store in St. Louis Park, Minnesota, check no. 1184 in the amount of \$373.00, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |
| 17 | 10/2/2011 | Used, at a retail store in Edina, Minnesota, check no. 396 in the amount of \$400.00, which check was falsely presented as a traveler's check, drawn on a closed account at USAA Federal Savings Bank. |
| 18 | 10/2/2011 | Used, at a retail store in Edina, Minnesota, check no. 1185 in the amount of \$373.00, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |

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| Count | Date (on or about) | Description |
|-------|--------------------|--|
| 19 | 10/2/2011 | Used, at a retail store in Edina, Minnesota, check no. 1186 in the amount of \$373.00, which check was falsely presented as a traveler's check, drawn on a closed account at Winona National Bank. |

5. All in violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATIONS

Counts 1 through 19 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

As the result of the offenses alleged in Counts 1 through 19 of this Indictment, the defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations charged in Counts 1 through 19 of the Indictment.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21,

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United States Code, Section 853(p), as incorporated by Title 28,
United States Code, Section 2461(c).

All in violation of Title 18, United States Code, Sections
371, 981(a)(1)(C), and 1344, and Title 28, United States Code,
Section 2461(c).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON